

1 WARREN METLITZKY (CA Bar No. 220758)  
2 **CONRAD | METLITZKY | KANE LLP**  
3 wmetlitzky@conmetkane.com  
4 Four Embarcadero Center, Suite 1400  
San Francisco, CA 94111  
(415) 343-7100

5 JULIE M. RIEWE (CA Bar No. 207520)  
6 **DEBEVOISE & PLIMPTON LLP**  
7 jriewe@debevoise.com  
8 801 Pennsylvania Avenue N.W.  
Washington, D.C. 20004  
(202) 383-8070

9 ELLIOT GREENFIELD (*pro hac vice*)  
10 **DEBEVOISE & PLIMPTON LLP**  
11 egreenfield@debevoise.com  
12 919 Third Avenue  
New York, NY 10022  
(212) 909-6772

13 Attorneys for Silver Lake  
14 Technology Management L.L.C.

15  
16 **UNITED STATES DISTRICT COURT**  
17 **NORTHERN DISTRICT OF CALIFORNIA**  
18 **SAN FRANCISCO DIVISION**  
19

20 IN RE TESLA, INC. SECURITIES  
21 LITIGATION

Case No. 3:18-cv-04865-EMC-KAW

22 **STIPULATION AND [PROPOSED]**  
23 **ORDER EXTENDING TIME FOR**  
24 **SILVER LAKE TO RESPOND TO**  
**PLAINTIFF'S ADMINISTRATIVE**  
**MOTION TO FILE UNDER SEAL**

1 Pursuant to Northern District of California Civil Local Rules 6-1 and 6-2, non-party Silver  
2 Lake Technology Management L.L.C. ("Silver Lake"), by and through its undersigned counsel of  
3 record, submit the following stipulation and proposed order:

4 WHEREAS, on January 11, 2022, Plaintiff Glen Littleton ("Lead Plaintiff"), filed a Partial  
5 Motion for Summary Judgment (ECF No. 352) and an Administration Motion to File Under Seal  
6 (ECF No. 351) ("Motion to Seal");

7 WHEREAS, the Northern District of California's Civil Local Rule 79-5(f)(3) requires that  
8 Silver Lake respond to the Motion to Seal in 7 days, or by January 18, 2022;

9 WHEREAS, Defendants filed an unopposed stipulation requesting until January 25, 2022  
10 to respond to the Motion to Seal;

11 WHEREAS, Plaintiff filed material containing confidential information relating to Silver  
12 Lake, and Silver Lake's counsel requires additional time to assess the content of the materials and  
13 to coordinate with Defendants' counsel about the scope and extent of their confidential  
14 information within those materials.

15 WHEREAS, neither Plaintiff nor Defendants object to the provisions of additional time for  
16 Silver Lake to respond to the Motion to Seal.

17 NOW, THEREFORE, Silver Lake requests that the Court enter an order providing Silver  
18 Lake until January 25, 2022 to respond to the Motion to Seal.

1 DATED: January 18, 2022

Respectfully submitted,

2 **LEVI & KORSINSKY, LLP**

3 /s/ Adam Apton

4 Adam Apton

5 *Attorneys for Plaintiff and Counsel for the Class*

6 DATED: January 18, 2022

**QUINN EMANUEL URQHART & SULLIVAN, LLP**

7 /s/ Michael T. Lifrak

8 Michael T. Lifrak

9 *Attorneys for Defendants*

10 DATED: January 18, 2022

**CONRAD | METLITZKY | KANE LLP**

11 /s/ Warren Metlitzky

12 Warren Metlitzky

13 *Attorneys for Silver Lake Technology Management*  
14 *L.L.C.*

15 I hereby attest that I obtained concurrence in the filing of this document from each of the  
16 other signatories on this e-filed document.

17 DATED: January 18, 2022

CONRAD | METLITZKY | KANE

18 /s/ Warren Metlitzky

19 Warren Metlitzky

20 \* \* \* \* \*

21 **[PROPOSED] ORDER**

22 PURSUANT TO THE TERMS OF THE ABOVE STIPULATION, it is SO ORDERED.

23 DATED: January \_\_, 2022

24 HON. EDWARD M. CHEN

25 UNITED STATES DISTRICT JUDGE